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September 16, 2013

**Via Electronic Filing**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

**Re: Notice of *Ex Parte* Presentation In the Matter of Connect America Fund WC Docket No. 10-90; Establishing Just and Reasonable Rates for Local Exchange Carriers WC Docket No. 07-135; High-Cost Universal Service Support WC Docket No. 05-337; Developing an Unified Intercarrier Compensation Regime CC Docket No. 01-92; and Federal-State Joint Board on Universal Service CC Docket No. 96-45**

Dear Ms. Dortch:

On behalf of the Rural Broadband Alliance (“RBA”), Keith Oliver, Senior Vice President of Home Telecom and Co-Chairman of the RBA, and I met with Rebekah Goodheart, Legal Advisor to Acting Chairwoman Clyburn, and Carol Matthey, Deputy Bureau Chief of the Wireline Competition Bureau, on September 12, 2013. We expressed the continuing concern regarding the adverse impact on investment in network infrastructure in rural areas that has resulted from the uncertainty created by the Commission rules established in the *USF/ICC Transformation Order*.

Mr. Oliver and I noted that the most recent July 26, 2013 Order issued by the Wireline Competition Bureau in WC Docket Nos. 10-90 and 05-337 has created additional uncertainty and unwarranted economic harm to rural companies. We discussed how the FCC’s new rules continue to place rural service providers in jeopardy by reducing their recovery of the much-needed investments they have made in their rural communities. As a result of the financial instability that has been imposed on the rural telecom industry, broadband infrastructure investment in rural America has been chilled.

We urged that the Commission suspend the utilization of the quantile regression analysis and take additional actions to restore stability and predictability to the high cost support mechanisms for rural telephone companies.

**September 16, 2013**

I am filing this letter electronically with your office for inclusion in the record of each of the above-referenced proceedings pursuant to the Commission's Rules. If you have any questions, please do not hesitate to contact me at 202-333-1770.

Sincerely,

s/ Stephen G. Kraskin

cc: Rebekah Goodheart  
Carol Matthey